

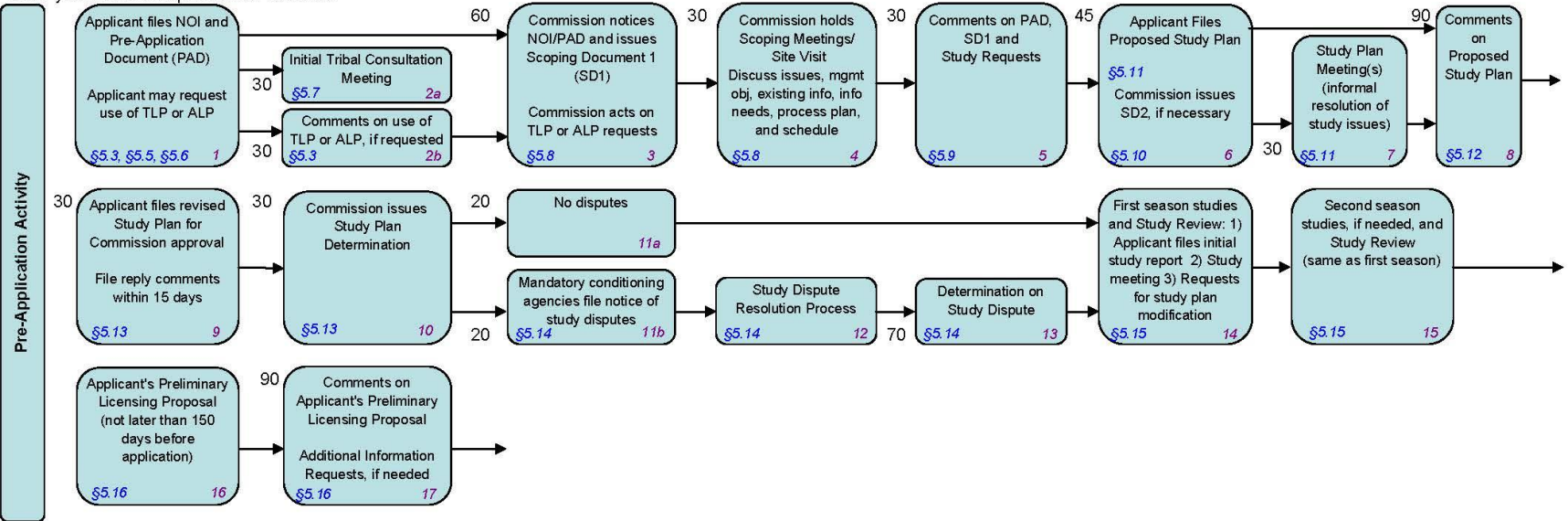


# Study Plan Development

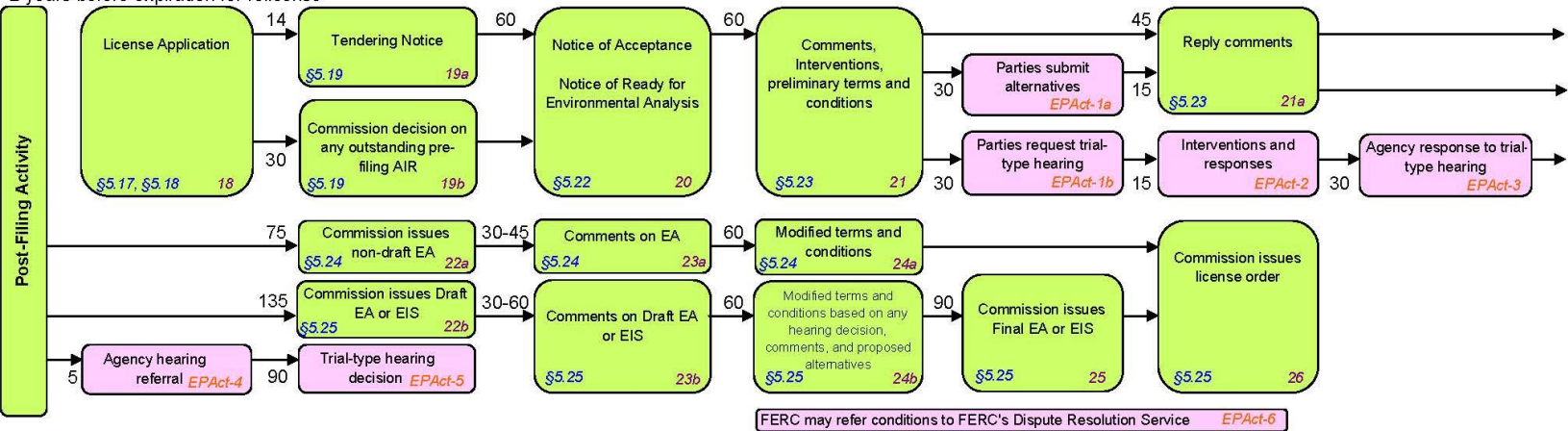
February 24, 2015

# Integrated Licensing Process (Section 241 of the Energy Policy Act of 2005)

5.5-5 years before expiration for relicense



2 years before expiration for relicense





# Scoping and Study Requests





# Scoping and Study Request Process

Scoping [see 18 CFR §§ [5.8](#), [5.9](#), and [5.10](#)]





# Study Request Criteria

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- Describe goals and objectives of study proposal
- Explain relevant resource management goals
- Explain relevant public interest considerations
- Describe existing information and need for more info
- Explain nexus to project operations and effects and how study results would inform license requirements
- Describe methodology and how it's consistent with accepted practice
- Describe consideration of level of effort and cost of study and why alternative study is needed





# Why are the study criteria important?

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- Increased understanding of stakeholder information needs
- More focused studies
- Better study plans and more efficient use of time





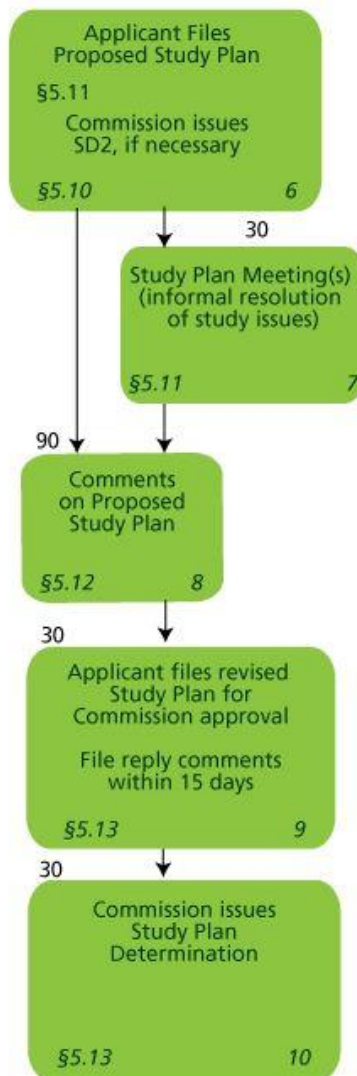
# Study Plan Development





# Study Plan Development

Study Plan Development [see 18 CFR §§ 5.11 [§](#), 5.12 [§](#), and 5.13 [§](#)]







# Study Plan Development

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*Study Requests*



45 days

*Proposed Study Plan*



90 days

*Study Plan Meetings*



30 days

*Revised Study Plan*



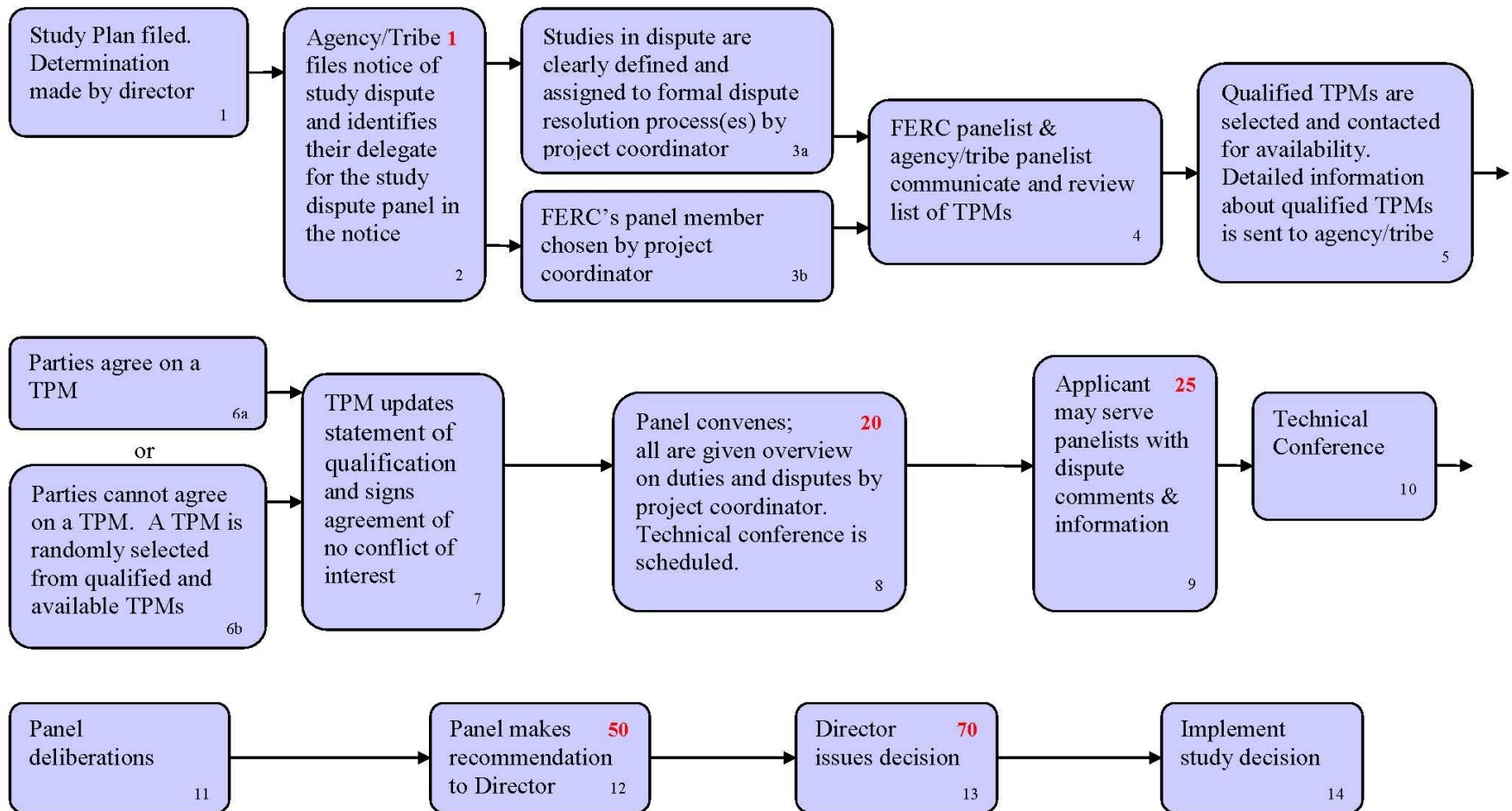
30 days

*OEP Director's Study Plan Determination*



# Study Dispute Resolution


## Formal Study Dispute Resolution



Numbers in red indicate the number of days permitted for each step from the date of the filing of the notice of the study dispute



# Study Plan Dispute Process

Formal Study Dispute Resolution Process [see 18 CFR [5.14](#) 

20 ↓  
Mandatory  
conditioning  
agencies file  
notice of  
study disputes

§5.14 11b

↓  
Study  
Dispute  
Resolution  
Process

§5.14 12

70 ↓  
Determination  
on Study  
Dispute

§5.14 13  
↓



# Study Dispute Resolution

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- Mandatory conditioning agency may dispute the OEP Director's determination for studies directly relating to the exercise of their conditioning authorities
  - A three-member panel of technical experts make recommendation
  - OEP Director considers the panel findings and makes decision with respect to study criteria and any applicable law or FERC policy



# Conduct Studies & Prepare Application

Prefiling



- Applicant conducts studies
- Applicant files study reports and parties review studies each year
- Applicant prepares Preliminary Licensing Proposal





# ILP Lessons Learned

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- Improved process efficiency by requiring:
  - Application preparation in conjunction with NEPA Scoping
  - Coordination with other participants' processes
  - Increased public participation



# ILP Lessons Learned (cont'd)

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- Improved process timeliness by requiring:
  - Early FERC staff assistance
  - Process plan & schedule
  - Early study plan development & informal/formal dispute resolution



# ILP Lessons Learned (cont'd)

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- Not appropriate for every project
- Works well for relicenses and projects that are complex, controversial, and benefit from structured timelines
- Does not work as well for original projects or projects with little controversy and low complexity
- Post-filing can still be slowed down by other participants' processes



# Questions?

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